

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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CONSOLIDATED COMMERCIAL CONTROLS, INC.	:	
	:	CASE NO. 1:08-cv-04388
Plaintiff,	:	Honorable Virginia M. Kendall
	:	
v.	:	
	:	
5 STAR SUPPLY LLC, et al.	:	
	:	
Defendants.	:	AUGUST 29, 2008
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DECLARATION OF CLIFFORD G. WILLIAMS, II

I, Clifford G. Williams, II, state under the pains and penalties of perjury as follows:

1. I am over the age of eighteen (18) and understand my obligation when making a statement to this Court under the pains and penalties of perjury.
2. I reside in and am a citizen of the State of Connecticut. At the time of Plaintiff's acquisition of ICS, I had been employed by ICS for approximately twenty-two (22) years as Receiving/Inventory Control Manager. As Receiving/Inventory Control Manager for ICS, I was responsible for overseeing receipts of inventory and inventory control. After Plaintiff's acquisition of ICS, I was demoted to a supervisory role within the warehouse, reporting to the warehouse manager.
3. Due to dissatisfaction with Plaintiff's operation of the former ICS and my desire not to work for a Chicago-based entity, I determined to resign my employment with Plaintiff. I resigned my employment with Plaintiff effective June 24, 2008.
4. At no time was I a party to an employment contract with either ICS or Plaintiff. I was not subject to any post-employment restrictions regarding competition or solicitation of

employees or customers of ICS or Plaintiff. Having no such limitations, after resigning from Plaintiff's employ, I became employed by Defendant 5 Star Supply LLC.

5. I did not misappropriate any confidential or trade secret information of Plaintiff, and I have not and will not utilize any confidential or trade secret information of Plaintiff in connection with my new employment.

6. Plaintiff failed to pay me the wages due me for the last two days of my employment.

7. I do not own any property or maintain any bank accounts in Illinois.

8. Other than in the course of my employment, I has never been to the state of Illinois or transacted any business there.

9. After Plaintiff's acquisition of ICS, I was required to attend a management meeting at Plaintiff's home office in Chicago, Illinois in November 2007. I also was required to attend the company's holiday party in Illinois in December 2007. I never visited Plaintiff's home office again after the initial management meeting.

10. Other than the foregoing limited visits, which were undertaken at the direction of and for the benefit of Plaintiff, I have never visited Illinois for any purpose whatsoever.

11. Since my resignation from Plaintiff's employ, I have not conducted business in Illinois; I do not maintain an office or employees within Illinois; I have not sent agents into Illinois to conduct business; I have not advertised or solicited business in Illinois; and I have not designated an agent for service of process in Illinois.

The foregoing statements were made under the pains and penalties of perjury.


Clifford G. Williams, II

8-29-08
Date

EXHIBIT A

Check-Mate Earnings Report
Check DetailRequest Number: 30
Check Sequence Number: 1Co File Dept
MRA 112 Warehouse Manag

Social Security Number: Clifford G Williams II

Taxable Marital Status: Single

Exemptions/Allowances:

Federal: 0

State: 0

Local: 0

Earnings	Hours	This Period
Regular	0.00	453.68
Overtime	0.00	0.00

Gross Pay 453.68**Deductions****Statutory**

Federal Income Tax 39.55

Social Security Tax 28.75

Medicare Tax 6.73

State Income Tax 15.49

Other**Unearned Vacation** 0.00**Net Pay** 0.00